

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

RAPID COMPLETIONS LLC, §
Plaintiff, §
v. §
§
BAKER HUGHES INCORPORATED, §
BAKER HUGHES OILFIELD OPERATIONS, §
INC., WEATHERFORD INTERNATIONAL, §
LLC, WEATHERFORD/LAMB, INC., §
WEATHERFORD US, LP, WEATHERFORD §
ARTIFICIAL LIFT SYSTEMS, LLC, PEAK §
COMPLETION TECHNOLOGIES, INC., §
PEGASI ENERGY RESOURCES §
CORPORATION, PEGASI OPERATING, §
INC., AND TR RODESSA, INC., §
Defendants, §
v. §
§
PACKERS PLUS ENERGY SERVICES, INC., §
RAPID COMPLETIONS LLC, §
Counterclaim Defendants. §
§

Case No. 6:15-cv-724-RWS-KNM

**WEATHERFORD'S AND BAKER HUGHES' UNOPPOSED MOTION TO MODIFY
FIRST AMENDED DOCKET CONTROL ORDER**

The Weatherford and Baker defendants (collectively “Defendants”) file this Unopposed Motion to Modify First Amended Docket Control Order and request that the First Amended Docket Control Order (Doc. No. 151) previously entered in this action be modified as set forth below:

1. The current deadline for the parties’ amended pleadings is June 9, 2016 and the current deadline to respond to amended pleadings is June 23, 2016.
2. Defendants request that the deadline for it to file its amended pleadings be extended for a period of seven (7) days from the current deadline of June 9, 2016, up to and including June 16, 2016. If said request is granted by the Court, Defendants additionally request

the Court to extend Plaintiff Rapid Completions, LLC's corresponding deadline for responding to Weatherford's amended pleadings for a period of seven (7) days from the current deadline of June 23, 2016 to June 30, 2016.

3. Defendants' request for a brief extension of the deadline to file its amended pleadings and Plaintiff Rapid Completions, LLC's deadline to respond to defendants' amended pleadings is made so that justice may be done, and not for any improper purpose.

4. Plaintiff Rapid Completions, LLC is not opposed to the extension of the amended pleadings deadlines requested by Defendants herein.

5. A proposed Order Modifying the First Amended Docket Control Order granting Defendants' requested amendments extending the identified deadlines is submitted herewith.

WHEREFORE, Defendants respectfully request the Court to grant this Unopposed Motion to Modify the First Amended Docket Control Order and for such other and further relief as the Court deems suitable and just.

DATED: June 9, 2016

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANTS
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CERTIFICATE OF SERVICE

This is to certify that all known counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per E. Dist. Tex. Loc. Ct. R. CV-5(a)(3) on this the 9th day of June, 2016. Any other known counsel of record will be served with a copy of this document by email and/or facsimile transmission.

/s/Christopher M. First/
Christopher M. First

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel for Baker Hughes and Weatherford contacted counsel for Plaintiff Rapid Completions, LLC with respect to the foregoing motion and Plaintiff Rapid Completions, LLC is unopposed to the relief requested in this motion.

/s/Christopher M. First/
Christopher M. First